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ARIZONA CORPORATION COMMISSION  
DOCKET CONTROL

November 16, 2009

**ORIGINAL**

Chairperson Kristin K. Mayes  
Commissioner Gary Pierce  
Commissioner Paul Newman  
Commissioner Sandra D. Kennedy  
Commissioner Bob Stump

Arizona Corporation Commission

**DOCKETED**

NOV 16 2009

**Comments on Proposed Order on Resource Planning Rules  
(Docket No. RE-00000A-09-0249)**



Dear Chairperson Mayes and Commissioners:

Thank you for the opportunity to comment on the Proposed Order on Resource Planning Rules. Please accept these comments on behalf of the Sierra Club and our 12,000 plus members in Arizona.

The Sierra Club's purpose is "to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; and to educate and enlist humanity to protect and restore the quality of the natural and human environments." Our members are very interested in and care about energy issues, the impacts of the ways we generate electricity, including so-called externalities. We are also committed to helping our state and our country invest in greater energy efficiency and renewable energy resources.

First of all, we want to express our appreciation to the Arizona Corporation Commission (Commission) for showing leadership on energy issues, including renewable energy and energy efficiency, and for putting consideration of "externalities" on the table for consideration. As you all know, clean air, clean water and adequate water, wildlife and wildlife habitat, and more, should hardly be considered externalities. They are essentials. We are also supportive of using a life cycle analysis for energy production.

We appreciate the rule referencing the environmental impacts of power generation. We also support the rule recognizing the uncertainties relative to planning and the gathering of public input prior to the filing of resource plans. Western Resource Advocates submitted several technical suggestions with which we agree, including

We are supportive of including a requirement to evaluate each type of electrical generation in terms of "life-cycle" analysis, including considering the costs and emissions for producing electricity as well as transporting it, water use and water quality impacts, air quality impacts and the impacts on public health. It is our understanding that these may be considered in a separate process. We are supportive of that as well, but encourage the Commission to move forward with consideration of these important matters.

The fifteen year planning horizon in today's rapidly changing energy landscape seems a bit long to us. The Commission may want to consider five or ten years instead.

The resource planning rule should focus on the larger generators and not burden the staff, the Commission, and the private sector with costs associated with this rule. The focus should be on the resource decisions that have implications statewide.

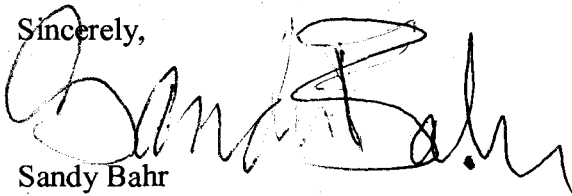
Production costs (Section 701) should include fuel costs.

A definition of "environmental impact" should be added and should be inclusive to reflect the many areas affected by electricity generation, but not limited to, effects on human health, damage to wildlife, plants, or habitat, aesthetic effects, air and water pollution, water consumption, waste produced, and impairment of visibility.

Finally, we encourage you to consider providing for additional opportunities for public review and comment. On all processes, including resource planning, the Commission should attempt to provide for ease of commenting by making commenting easier via electronic forms. This will save time, paper, money, and more, plus we make it easier for the public to engage.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Sandy Bahr", written over a horizontal line.

Sandy Bahr  
Chapter Director  
Sierra Club – Grand Canyon Chapter